THE HONORABLE MARSHA J. PECHMAN 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT TACOMA 8 9 JENNIFER BRITT, Individually and for Others No. 3:23-cv-05377 MJP Similarly Situated, 10 STIPULATED MOTION AND Plaintiff, [PROPOSED] ORDER FOR 11 EXTENSION OF TIME TO FILE MOTION FOR PRELIMINARY v. 12 APPROVAL CLALLAM COUNTY PUBLIC HOSPITAL DISTRICT NO. 2 d/b/a OLYMPIC MEDICAL **NOTED FOR HEARING:** 13 CENTER, a Washington Municipal Corporation, **JUNE 12, 2024** 14 Defendant. 15 16 Pursuant to Local Rules 7(d)(1) and 10(g), Jennifer Britt ("Plaintiff") and Defendant 17 Clallam County Public Hospital District No. 2 d/b/a Olympic Medical Center ("Defendant") 18 jointly move for an extension of time to file the Motion for Preliminary Approval. The Parties 19 stipulate to and request an extension to 16 days after the current deadline of Wednesday, June 12, 20 2024, until Friday, June 28, 2024. 21 The Parties filed a Joint Notice of Class and Collective Action Settlement on February 2, 22 2024. That notice indicated "Plaintiff anticipate[d] filing a motion for preliminary approval, 23 together with supporting documentation, within sixty calendar days," i.e., by April 12, 2024. 24 25 26

STIPULATED MOTION FOR EXTENSION OF TIME (No. 3:23-cv-05377 MJP) –1 Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 Phone: +1.206.359.8000 Fax: +1.206.359.9000

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On April 11, 2024, the parties requested an extension until May 13, 2024. Dkt. #30. The Court granted the motion. Dkt. #31. On May 10, 2024, the parties requested a second extension until June 12, 2024. Dkt. #32. The Court granted the motion. Dkt. #33.

Since the last request for an extension of time, the Parties have made substantial progress toward finalizing the settlement agreement, class notice, and claim form. The parties have exchanged seven drafts of the settlement agreement, three drafts of the class notice, and three drafts of the claim form. On June 3, 2024, the parties had a productive telephonic conference to discuss several areas of disagreement. A few areas of disagreement remain, and the parties believe both will be resolved upon further discussion between the parties. Settlement discussions continue in good faith.

The parties have conferred and agree to request a modest extension of the time to submit the motion for preliminary approval and supporting documents, and agree that Friday, June 28, 2024, is a reasonable accommodation to allow the Parties to finalize the relevant materials.

This is the third request for an extension. No other dates or deadlines would be altered by this proposed extension of time.

26 STIPULATED MOTION FOR EXTENSION OF TIME

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[PROPOSED] ORDER IT IS SO ORDERED. Plaintiff shall file her Motion for Preliminary Approval no later than June 28, 2024. No further extensions of this deadline shall be granted. Dated this 13th day of June 2024. Maisley Helens THE HONORABLE MARSHA J. PECHMAN United States District Court Judge

[PROPOSED] ORDER (No. 3:23-cv-05377 MJP) – 1